

EXHIBIT 2

FILED UNDER SEAL

From: SESSIONS, Justina (JKS)
To: Zeke DeRose III; Marc B. Collier; Geraldine W. Young; BAYOUMI, Jeanette
Cc: Yetter, Paul; MCCALLUM, Robert; Bracewell, Mollie; MAHR, Eric (EJM); Moran, David; Nilsson, William (DAL); Mark Lanier; Ashley Keller; John McBride; Jonathan Wilkerson; Young, Trevor (TX); Peter M. Hillegas; James Lloyd; Thomas Ray; Alex J. Brown; SALEM, Sara; ELMER, Julie (JSE); SONG, Tinnv; Marisa Madaras; Gabriel Culver
Subject: RE: Google AdTech (EDTX): Categories and First Priority of States" 30(b)(6) to Google per Special Master Conference
Date: Wednesday, April 24, 2024 5:16:44 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[2024.04.24 Response re 30\(b\)\(6\).docx](#)

Dear Zeke –

We respond to the questions and open issues you noted on 30(b)(6) depositions in the attached chart.

I want to highlight two items:

First, with respect to Mr. Mohan. If Mr. Mohan is required to sit for a 30(b)(1) deposition, he is available on May 3. If that deposition occurs, Mr. Mohan will also testify as a 30(b)(6) designee regarding the DoubleClick acquisition. In the event that Mr. Mohan is not required to sit for a 30(b)(1) deposition, Google will provide an alternative designee on the 30(b)(6) topic of the acquisition, and we will provide that availability as soon as possible.

Second, we had previously designated [REDACTED] to testify on some communications-related topics. In response to some of the requests for additional testimony that you made below and upon further investigation and consideration, we have determined that we will need to designate someone other than [REDACTED]. We are therefore withdrawing our designation of [REDACTED]. We will provide you with the availability for our new designee (who is designated on [REDACTED] topics as well as the additional topics discussed in the chart below) as soon as possible.

Regards,
- Tina